

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE: NEO WIRELESS, LLC,  
PATENT LITIGATION

Case No. 2:22-MD-03034-TGB  
HON. TERRENCE G. BERG

**JOINT MOTION TO DISMISS U.S. PATENT NO. 10,965,512**

Plaintiff Neo Wireless, LLC (“Neo”) and the undersigned Defendants<sup>1</sup> jointly move to dismiss Neo’s claims against each of the Defendants for infringement of U.S. Patent No. 10,965,512 (‘512 Patent) with prejudice, with each

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<sup>1</sup> The Defendants include Ford Motor Company; Tesla, Inc.; General Motors Company and General Motors LLC (collectively “GM”); FCA US LLC; Toyota Motor Corporation, Toyota Motor North America, Inc., Toyota Motor Sales, U.S.A., Inc. and Toyota Motor Engineering & Manufacturing North America, Inc. and Toyota Motor Credit Corporation (collectively “Toyota”); American Honda Motor Co., Inc. and Honda Development & Manufacturing of America, LLC (collectively “Honda”); and Nissan North America Inc. and Nissan Motor Acceptance Corporation a/k/a Nissan Motor Acceptance Company LLC (collectively “Nissan”).

party bearing its own fees and costs relating to the assertion of the ‘512 Patent against the Defendants in this case.

In the accompanying Joint Stipulation filed together herewith as Exhibit A and also submitted to the Judge for entry via the ECF Utilities function:

- Neo stipulates to the dismissal of the ‘512 Patent with prejudice.
- Defendants stipulate to dismiss their counterclaims (as applicable to each Defendant) relating to the ‘512 Patent.
- Neo agrees and covenants that neither it nor any of its subsidiaries or successors-in-interest will sue any of the Defendants or their current affiliates for infringement of the ‘512 Patent, or the specified foreign counterparts identified in Exhibit A, now or in the future.
- The undersigned Defendants General Motors, Ford, Nissan, Tesla, and Honda agree to terminate their respective IPR proceedings on the ‘512 Patent within seven (7) days of entry of the Joint Stipulation, and the Defendants agree not to participate in any further challenges to the validity of the ‘512 Patent.
- For the reasons in Exhibit A, dismissal of the ‘512 Patent and the terms of the Joint Stipulation shall not be introduced as evidence at any trial in this case.

Date: January 22, 2024

Respectfully submitted,

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